

RECEIVED
Aug 15 2022
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

W.C.C. 1302588
Appellate Case No. 2017-001732
Opinion No. 2022-UP-002
(Submitted October 1, 2021 – Filed January 5, 2022
Withdrawn, Substituted, and Refiled June 21, 2022)

Timothy Causey,.....Appellant,

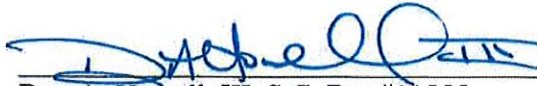
v.

Horry County, Self-Insured
through S.C. Counties Workers' Compensation Trust,.....Respondents.

JOINT MOTION TO STAY APPEAL AND REMAND

Pursuant to Rules 240, 241, and 265, S.C.A.C.R., the undersigned counsel for the Appellant and counsel for the Respondents hereby respectfully request a stay of the above-referenced appeal and remand of this case to the South Carolina Workers' Compensation Commission. The parties have reached a tentative settlement agreement, which requires that the South Carolina Workers' Compensation Commission identify the real party (or parties) in interest at a dependency hearing. The named Appellant, Timothy Causey, is deceased. The parties agree to promptly notify the Court of any final settlement agreement, or, in the alternative, will move the Court for a lifting of the stay.

Respectfully submitted,



Roy A. Howell, III, S.C. Bar #11888
Kirsten Leslie Barr, S.C. Bar #15525
Trask & Howell, L.L.C.
P.O. Box 2167
Mt. Pleasant, S.C. 29465
(843) 881-4228
Attorneys for Respondents



Allison P. Sullivan, S.C. Bar #73754
Bluestein Thompson Sullivan, LLC
P.O. Box 7965
Columbia, SC 29202
(803) 779-7599
Attorneys for the Appellant

Francis A. Humphries, Jr., S.C. Bar #12921
William H. Monkton, VI, S.C. Bar # 65167
Monkton Hembree & Humphries
1300 Professional Drive, Suite 102
Myrtle Beach, S.C. 29577
(843) 956-6556
Attorneys for the Appellant

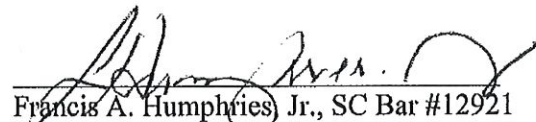
August 15, 2022

Respectfully submitted,

Roy A. Howell, III, SC Bar #15525
Kirsten L. Barr, SC Bar #11888
Trask & Howell, LLC
P.O. Box 2167
Mt. Pleasant, SC 29465
(843) 881-4228

Attorneys for Respondents

Allison P. Sullivan, SC Bar #73754
Bluestein Thompson Sullivan, LLC
P.O. Box 7965
Columbia, SC 29202
(803) 779-7599



Francis A. Humphries Jr., SC Bar #12921
William H. Monckton, VI, SC Bar #65167
Monckton Hembree & Humphries
1300 Professional Drive, Suite 102
Myrtle Beach, SC 29577
(843) 946-6556

Attorneys for Appellant

August 15, 2022

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

Aug 15 2022

SC Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

WCC File No. 1012533
Appellate Case No. 2017-001732
Opinion No. 2022-UP-002
(Substituted October 1, 2021 - Filed January 5, 2022
Withdrawn, Substituted, and Refiled June 21, 2022)

Timothy Causey, Appellant,

v.

Horry County, Self-Insured
through S.C. Counties Workers' Compensation Trust Respondent.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel for the Respondents with a copy of the *Joint Motion to Stay Appeal and Remand* by email only to the following:

Roy A. Howell, III, Esq.
Kirsten L. Barr, Esq.
Rhowell@trask-howell.com
kbarr@trask-howell.com



Kalen Reed, Paralegal

August 15, 2022

Kalen Reed

From: Kalen Reed
Sent: Monday, August 15, 2022 6:24 PM
To: rhowell@trask-howell.com; kbarr@trask-howell.com
Cc: Allison Sullivan; cchassereau@trask-howell.com
Subject: Timothy Causey v. Horry County 2017-001732
Attachments: Joint Motion to Stay Appeal and Remand.pdf

Good afternoon,

Attached please find a *Joint Motion to Stay Appeal and Remand* which is being served upon you in the above matter.

Thank you,



KALEN REED PARALEGAL

1614 TAYLOR STREET | PO BOX 7965
COLUMBIA, SOUTH CAROLINA 29202
O: 803.779.7599 F: 803.771.8097

KALEN@BLUESTEINATTORNEYS.COM

BLUESTEINATTORNEYS.COM



NOTICE: This e-mail is confidential and may contain information which is legally privileged or otherwise exempt from disclosure. If you received this message in error, please notify the sender and delete this message from your device.

August 15, 2022

RECEIVED
Aug 15 2022
SC Court of Appeals

VIA EMAIL ONLY - ctappfilings@sccourts.org

The Honorable Jenny Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201


RE: Timothy Causey (dec.) v. Horry County
Appellate Case No.: 2017-001732

Dear Ms. Kitchings:

Enclosed for filing, please find a *Joint Motion to Stay Appeal and Remand* in reference to this case as well as a Proof of Service for same.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Yours truly,



Allison P. Sullivan

APS/knr
Enclosures

cc: Roy A. Howell, III, Esq.
Kirsten L. Barr, Esq.
Francis A. Humphries, Jr., Esq.
William Henry Monckton, IV, Esq.